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SUBMITTED VIA ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.,
Washington, D.C. 20054

Re: ***Ex Parte Meeting***
MB Docket No. 03-15, RM 9832, Second Periodic Review of the Commission's
Rules and Policies Affecting the Conversion to Digital Television

Dear Ms. Dortch:

This is to notify you that on October 21, 2003, I met with several FCC staff at the Media Bureau including: Rick Chessen, Eloise Gore, Michael Lance, Mike Wallid-Kassem, and Peter Corea. Since 1989, I have been involved in the development and implementation of v-chip technology in Canada, the United States, and most recently in Brazil.

During this meeting the participants discussed issues addressed in the above-referenced proceedings related to the implementation of parental controls in DTV receivers using the ATSC A/65-B ("PSIP") and EIA-766-A standards. Specifically, Rating Region Tables (RRTs) and Content Advisory Descriptors (CADs) were discussed.

I explained that the RRT for rating_region 0x01 (as defined in section 4.1 of EIA-766-A) can not be fully interpreted by DTV receivers using the RRT syntax specified in PSIP alone. This is because the rating_value defined in several dimensions of the RRT for rating_region 0x01 (namely "D", "L", "S", and "V"), depends on the rating_value defined in the "Audience" dimension. Instead, for rating_region 0x01 only, the set-up menu for configuring the parental controls in a DTV receiver is currently designed based on a specific set of 54 permissible CADs that are defined in section 5.1 in EIA-766-A.

A DTV receiver currently disregards any broadcast RRT for rating_region 0x01 since the information contained in this RRT cannot be used (on its own) to build a correct user interface for rating_region 0x01. If an RRT is created based on the syntax rules specified in section 6.4 of PSIP, a DTV receiver can construct a table-driven user interface menu for configuring the parental controls for that region, and it will produce predictable receiver behavior for the content advisory system used in that region.

According to section 6.9.4 of PSIP, it is possible that a program may contain CADs from several rating_regions, up to a maximum of 8 regions for each program. An additional rating_region can be used to extend a content advisory system. For example, a program can be assigned a CAD from rating_region 0x01 in addition to CAD(s) from one or more rating_regions.

Of course, any new RRT structure for a rating_region would need to be created according to the specified PSIP syntax (without interdependent dimensions) in order to be interpreted properly by DTV receivers. In addition, DTV receivers would need to be designed with the flexibility and capability to receive additional RRT structures in order to be able to operate with new content advisory systems.

In accordance with section 1.1206 is being filed electronically in the above docket and sent to all Commission participants.

Yours truly,
Tim Collings

Cc: Rick Chessen
Eloise Gore
Michael Lance
Mike Wallid-Kassem
Peter Corea